

Exhibit A

DISCOVERY PLAN WORKSHEET

Phase I (Pre-Settlement Discovery)

Deadline for completion of Rule 26(a) initial disclosures
and HIPAA-complaint records authorizations:

November 15, 2017

Completion date for Phase I Discovery
as agreed upon by the parties:
(Presumptively 60 days after Initial Conference)

January 8, 2018

Phase II Discovery and Motion Practice

Motion to join new parties or amend the pleadings:

February 2, 2018

First requests for production of documents
and for interrogatories due by:

February 19, 2018

All fact discovery completed by:

June 4, 2018

Exchange of expert reports completed by: Plaintiff By:
Defendant By:

July 9, 2018

August 8, 2018

Expert depositions completed by:

September 7, 2018

COMPLETION OF ALL DISCOVERY BY:

(Note: Presumptively 9 months after Initial Conference.)

September 8, 2018